

### REMARKS

An Office Action was mailed on April 20, 2004. Claims 1 - 22 are pending.

#### SUPPORT FOR THE AMENDMENTS

The limitations of claim 2 have been incorporated into each of the independent claims; corresponding support in the specification is found in the paragraph bridging pages 5 and 6 (e.g. "The icons that are used to identify these options correspond to particular control buttons on the controller.") Support for reciting a relationship between the arrangement of icons around the hyperlink, and the keys on the controller, is on page 6, lines 20 - 21 ("For example, these can be four icons positioned quadrilaterally about the banner hyperlink - each icon associated with a particular option."), page 5, line 15 ("The guidance diagram does not obstruct the normal operation of the web site") and Fig. 3 and Fig. 5.

#### REJECTIONS UNDER 35 U.S.C. § 102

Claims 1 - 8 and 11 - 22 stand rejected under 35 U.S.C. 102(b) over Berstis, U.S. 6,018,345.

The present invention relates to a method for associating a plurality of web site addresses, functions, and controller input options with one hyperlink. This method enables the user to save steps when navigating within a web site or between web sites. For instance, a banner ad could give users the option of either going to the advertiser's home page for more information about a product, or go directly to a page from which the product can be purchased.

As amended the claims stand clear of Berstis, which discloses a method for graphically signaling the user how to activate a hyperlink. That is done by changing the appearance of the link on the screen - replacing it with the word "GO". Since a button on a controller is also labeled "GO" this signal may be intuitive to a novice. But the function of the hyperlink remains exactly the same as with any normal link, i.e., it goes to the one web address that that link normally goes to, only its appearance changes.

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In contrast, the present invention changes the function of a hyperlink by expanding its versatility for navigating around a web site (or other web sites), by associating a plurality of addresses or functions. That is done in a highly intuitive way by associating different options with different indicia on keys of the controller.

Berstis fails to anticipate the invention. For instance, it does not disclose a hyperlink associated with a *plurality of options serving different functions*, as claimed. (e.g. "... a guidance diagram on the web site containing a plurality of options identified by icons arranged around the hyperlink, each option being selectable by a key on a controller connected to the host server, said key being identified by an icon corresponding to an icon of one option." See, Claim 22)

As for obviousness, Berstis would not have suggested expanding the role of one hyperlink so as to intuitively guide the user through multiple options. Indeed, the whole point of the method is to guide a novice through the most elementary use of a hyperlink – the simple act of selecting it – essentially a signal how to "left click" on a link. This idea would not have suggested an advanced method for navigating quickly thorough a web site, and even deep within separate web sites, in fewer steps.

Finally, it noted that the Manual For Patenting Examining Procedure (MPEP) § 2131 sets forth the standard for rejecting a claim under 35 U.S.C. § 102(b). "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." (MPEP § 2131, quoting Verdegaal Bros. v. Union Oil Co. of California 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). "The identical invention must be shown in as complete detail as is contained in the ...claim." (MPEP § 2131, quoting Richardson v. Suzuki Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). "The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, i.e. identity of terminology is not required." (MPEP § 2131, citing In re Bond, 15 USPQ2d 1566 (Fed. Cir. 1990)).

Accordingly, it is respectfully requested that the Examiner withdraw the rejection under 35 U.S.C. § 102(b).

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REJECTIONS UNDER 35 U.S.C. § 103

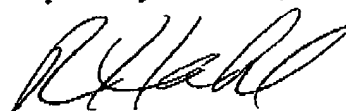
The Examiner has rejected claim 9 under 35 U.S.C. §103(a) as being unpatentable over Berstis and Andrew et al. (U.S. 6,633,310); and claim 10 over Berstis, Andrew et al., and Bonura et al. (U.S. 6,670,970).

Claims 9 and 10 are dependent claims which merely recite additional features of the invention, and are allowable on the same basis as the independent claims, as amended, for the reasons set forth above.

An earnest effort has been made to be fully responsive to the Examiner's objections. In view of the above amendments and remarks, it is believed that claims 1 - 22 consisting of independent claims 1, 14 and 22, and the claims dependent therefrom, are in condition for allowance. Passage of this case to allowance is earnestly solicited. However, if for any reason the Examiner should consider this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged on Deposit Account 50-1290.

Respectfully submitted,



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